

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiffs,

-against-

THE REPUBLIC OF CUBA,

Defendant.

x

:
: NOTICE OF CROSS MOTION
: TO STAY PROCEEDINGS

: 12-Civ-1596 (AKH)

x

PLEASE TAKE NOTICE that upon Garnishee Deutsche Bank Trust Company America’s Memorandum of Law in Opposition to Motion for Turnover and in Support of Motion to Stay Judgment Enforcement Proceedings, the supporting Declaration of Mark P. Gimbel dated March 14, 2013, the exhibits thereto, and all prior papers and proceedings herein, Garnishee Deutsche Bank Trust Company Americas (“DBTCA”) shall move this Court, at the United States Courthouse, 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an order staying all judgment enforcement proceedings by Plaintiff with respect to the blocked wire transfers held at DBTCA pending the resolution of two appeals now pending in the United States Court of Appeals for the Second Circuit that raise legal issues potentially dispositive of Plaintiff’s claims — *Calderon-Cardona et al. v. JPMorgan Chase Bank, N.A., et al.* (Second Circuit Docket No. 12-75) and *Hausler v. JPMorgan Chase Bank, N.A.* (Second Circuit Docket No. 12-1272) — and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 18, 2013

COVINGTON & BURLING LLP

By: s/ Mark P. Gimbel
Mark P. Gimbel

The New York Times Building
620 Eighth Avenue
New York, NY 10018
(212) 841-1000
mgimbel@cov.com

*Counsel for Deutsche Bank Trust
Company Americas*